Before the

Federal Communications Commission

Washington D.C. 20554

In the Matter of

Application by Qwest Communications International, Inc. For Authorization to Provide In-Region, InterLATA Services In New Mexico, Oregon and South Dakota	)))))	WC Docket No. 03-11

REPLY DECLARATION OF SHERRY LICHTENBERG

1. I am the same Sherry Lichtenberg who provided a declaration in this proceeding in conjunction with WorldCom's initial Comments. The purpose of my reply declaration is to update the status of the problems WorldCom is experiencing with Qwest's OSS. Those problems continue to be dramatic. While some of the initial problems I described have now been fixed, new ones have arisen. And all of them demonstrate the significant difficulties caused by Qwest's complex, non-standard OSS and poor documentation.

Feature Related Rejects

2. In my initial Declaration, I discussed one difficulty caused by Qwest's requirement that CLECs differentiate between existing features and new features when they placed orders. I explained that in order to determine which features are existing features, a CLEC must associate the features on the CSR with a particular telephone number. Yet Qwest failed to document that the telephone number(s) reside in a different place on the CSR for single line rather than multi-line customers. As a result, WorldCom designed its interfaces without understanding this difference, and virtually all of its orders for single-

line customers rejected. WorldCom therefore had to shut down its interfaces for nearly two weeks and rebuild them.

3. In an *ex parte* letter for February 14, Qwest states that "other CLECs did not interpret Qwest's documentation in this manner, and that, in any event, Qwest has committed to modify its documentation to address WorldCom's concern." Qwest does not deny, however, that its current documentation is incomplete and misleading. It does not say that its current documentation explains the difference between single line and multi-line accounts. That is because the documentation does not explain this, as Qwest has previously acknowledged – and also acknowledged the same day it submitted its letter.

4. Indeed, on February 14, Qwest initiated a Change Request to update its documentation in the future to show that the telephone number is located on a different place on the CSR for single line accounts (it is part of the account number) than for multi-line accounts (it is in the feature detail). "Generally, CSRs that only contain one TN will not have TN FID detail following individual USOCs," Qwest stated. Qwest further explained that "The PCAT [Product Catalog] will be updated to provide documentation concerning existing processes/products *not previously documented*." (Att. 1) (emphasis added). Thus, Qwest again acknowledged that its current documentation does not appropriately differentiate between single-line and multi-line accounts, and that new documentation will be required for this purpose.

5. Qwest's February 14 change request at least notifies CLECs of the inadequacy of its present documentation. But that does not justify the inadequacies of the prior documentation or Qwest's refusal immediately to notify CLECs when WorldCom

discovered the problem. Indeed, it may be that Qwest only provided the February 14 notification because of the pressures of the section 271 process.

6. As for Qwest's claim that other CLECs have been able to develop EDI interfaces despite Qwest's inaccurate documentation, I have asked other CLECs whether they are submitting residential orders via EDI. I am aware of only one CLEC other than WorldCom that is submitting residential UNE-P orders via EDI and that CLEC, New Access, told me it took one year to develop its EDI interface. New Access is still submitting only a small volume of orders. Even if other CLECs are also submitting UNE-P orders via EDI, Qwest certainly provides no evidence that other CLECs were able to build effective interfaces without a trial and error process that required significant modifications to systems along the way.

7. WorldCom, too, expects that it will eventually be able to overcome many of the difficulties caused by Qwest's OSS. Indeed, by shutting down and redeveloping its interfaces, WorldCom has been able to overcome the difficulty caused by Qwest's documentation for single-line accounts. Z-Tel also was able to gradually reduce the rejects caused by Qwest's complex systems and poor documentation when WorldCom submitted orders through Z-Tel's systems, although the reject rate still remained exceedingly high (more than 30%).

8. But the fact that CLECs such as WorldCom and Z-Tel may eventually be able to overcome some of the difficulties caused by Qwest's OSS does not mean that OSS is adequate. Developing interfaces by trial and error is a very expensive process that also severely impacts customers by increasing reject rates during the development process.

That is why the FCC has consistently emphasized the importance of accurate documentation and quality technical assistance.

9. The problem WorldCom experienced with single-line accounts is only an example of the more general problem with Qwest's complex OSS and poor documentation that results in the need to develop interfaces through trial and error. After WorldCom began resubmitting orders at the beginning of February, it discovered that it was receiving an inordinate number of rejects for feature-related issues on multi-line accounts. Indeed, of the orders WorldCom submitted, approximately 60% were rejected. Of those, approximately 60% were rejected for feature-related reasons, primarily having to do with WorldCom's ostensible failure to differentiate between existing features and new features as Qwest requires.

10. Because WorldCom had built its systems to differentiate between existing features and new features, WorldCom began pulling Qwest CSRs on orders it had already submitted to determine the cause of the rejects. WorldCom determined that Qwest CSRs often (or always) are out of sequence. That is the feature information for particular telephone numbers is not all grouped together on the CSR. The first line of the relevant section of the CSR may contain the customer's first phone number in the feature detail and some of the features associated with that phone number. The second line may then list a second phone number in the feature detail and some of the features associated with that phone number. But the third line may again list the first phone number and include more feature associated with that phone number (or duplicates of the features originally listed). In other words, the feature information for the customer's multiple phone numbers is all

mixed together. This is entirely illogical, is not how CSRs are organized anywhere else in the country, and has not been documented by Qwest.

11. The out-of-sequence CSRs are causing most of the feature-related rejects WorldCom is receiving. For multi-line accounts, WorldCom constructed its systems to look in the feature detail information on the CSR for a telephone number. The WorldCom systems then associate the relevant features with that telephone number. The systems continue to associate features with that telephone number until they come to feature detail information that includes a different telephone number. At this point, the systems are built to assume that all of the features for the first telephone number have been collected. That is because WorldCom had no reason to assume that Qwest would include features out of sequence. No other ILECs do so, Qwest's documentation does not indicate that it does so, and there is no reason for Qwest to do so. As a result, for CSRs that have information out-of-sequence, WorldCom does not obtain all of the feature information and thus is unable to differentiate properly between existing features and new features.

12. When WorldCom discovered this problem, we asked Qwest whether accounts with the out-of-sequence problem exist in SATE. Qwest initially said they did, but, after examining the accounts in SATE said that none were out-of-sequence, and then later said that one account with out-of-sequence feature information was included in SATE beginning in December. The fact that only one of the many accounts in SATE was out-of-sequence explains why WorldCom did not discover the out-of-sequence problem until it entered production. It may also explain why the third-party testers did not discover the problem. The CSRs used in the test, like those in SATE, were constructed specifically for testing. Perhaps because they did not contain information that was added

incrementally over time as customers added and subtracted lines, these CSRs likely were in-sequence, preventing anyone from discovering the complexities caused by out-of-sequence CSRs.

13. WorldCom does not know whether it is only some or all of Qwest multi-line accounts that have CSRs that are out-of-sequence. But it is clear that the number of accounts with this problem is high enough that it is creating massive rejects for WorldCom.

14. As a result, WorldCom is again having to redevelop its systems to work adequately with Qwest's non-standard, poorly documented OSS. WorldCom is now developing systems logic that will pull all of the feature information from the relevant CSR into WorldCom's systems, reorganize it in the proper sequence, and then use this information as the basis to submit an order. This redevelopment process is expensive and should have been entirely unnecessary. OSS development is not supposed to be a guessing game that requires massive rewriting of code each time a guess is wrong.

15. In addition, at present, Qwest has not provided all of the line class of service codes WorldCom needs to complete this development. WorldCom needs the line class of service codes because Qwest requires CLECs to provide both the old line class of service and the new line class of service on migration LSRs. Qwest has multiple classes of service (not all of which are documented).

16. Moreover, just as Qwest delayed announcing the problem with single-line accounts to CLECs, Qwest is failing in its responsibility to announce the problem with multi-line accounts to CLECs. Qwest has not announced to CLECs that CSRs contain feature information that is out of sequence and has not even said that it intends to do so. Thus, unless Qwest changes its mind in response to pressure created by this section 271

application, other CLECs developing EDI interfaces will face the same problem as WorldCom.

17. The problems WorldCom has experienced with feature information for single line and multi-line accounts are examples of the general types of problems caused by Qwest's complex, non-standard OSS and poor documentation. WorldCom fully expects to encounter more such problems in the future. Indeed, WorldCom has asked Qwest whether there are any other non-standard formats for the CSR. Qwest has responded that it does not know. That is unacceptable. WorldCom already has faced too many rejects and too much expense in writing code as a result of Qwest's incomplete information.

Address-Related Rejects

18. In addition to feature-related rejects, WorldCom is receiving an inordinate number of address-related rejects. Approximately 30% of the rejects WorldCom is receiving related to addresses, meaning that approximately 18% of WorldCom's orders are rejected for address-related reasons. Again, many of these rejects relate to Qwest's complex systems and poor documentation. And even where WorldCom may have been able to avoid some of these rejects, Qwest has not been at all accommodating in working to develop solutions to reduce these rejects.

19. Because Qwest requires a full address on every order, rather than allowing CLECs to place migration orders by Telephone Number ("TN") and Street Address Number ("SANO"), WorldCom retrieves the address through the service address validation function, uses that to retrieve the customer's CSR, and uses the address from the CSR to place on the orders. As I explained in my prior declaration, however, this process breaks down when the telephone number that WorldCom enters into the address validation

function ("SAV") is for a second line. In that instance, unlike with every other ILEC, WorldCom is unable to retrieve an address from the SAV function. WorldCom therefore types the address onto the order leading to typing errors that result in rejects.

20. Qwest responds in its February 14 *ex parte* that WorldCom should retrieve addresses by typing the address into the address validation function, rather than the telephone number. But CLECs should be able to validate addresses based on telephone numbers. To have to enter an address into the address validation function in order to retrieve an address is much more difficult. If the service representative makes a typing mistake, or fails to use the proper format, the validation inquiry either will reject, or may validate an incorrect address. For example, if the representative enters 9201 Bedford Avenue instead of 9202 Bedford Avenue the address may come back as valid but not be the customer's actual address. Qwest should permit address validation by TN for all residential numbers, as do other ILECs. Only when WorldCom began transmitting production orders did it become clear that it could not retrieve addresses by TN for second lines.

21. WorldCom is also receiving address rejects because it is using the address from the CSR to place on orders, rather than the address from the SAV function. This leads to rejects because the address on the CSR, which is from the CRIS database, often is different from the address in the PREMIS database that is accessed by the SAV function.

22. WorldCom acknowledges that Qwest recommends (but does not require) that CLECs use the address returned by the SAV inquiry on orders. But for a variety of internal reasons, WorldCom chose not to do so. WorldCom did not believe this would cause major problems in the interim because the CRIS and PREMIS databases for other ILECs are generally relatively consistent, with a relatively small variance between them, and

WorldCom also found this to be true in the Qwest region during testing. Unfortunately, however, the variance between CRIS and PREMIS appears to be much greater in production in the Qwest region than elsewhere. WorldCom sampled 15 addresses and found differences between the CRIS address and the PREMIS address on 6 addresses. Such substantial discrepancies should not exist.

23. Moreover, it is not at all clear that use of the PREMIS address would reduce rejects. WorldCom has repeatedly asked Qwest whether it edits orders against CRIS as well as PREMIS at any point in its back-end process and Qwest has refused to say. But just today Qwest informed WorldCom that on orders that fall out for manual processing, Qwest does edit the addresses against CRIS! Thus, manually processed orders that included the PREMIS address would be rejected if the PREMIS address differed from the CRIS address.

24. And use of PREMIS as a source of address information will be come even more problematic in April. When Qwest moves to migrate by TN and Street Address Number ("SANO") in April, Qwest will edit the SANO against CRIS, not PREMIS, as it has informed WorldCom. Qwest has nonetheless also told WorldCom that WorldCom should use the SANO from PREMIS even after April. But Qwest's instruction makes little sense. It appears very risky for WorldCom to change its systems based on the assumption that the SANO from PREMIS will work when Qwest is simultaneously saying SANO edits will occur against CRIS.

25. Even more important, Qwest requires CLECs to include on many orders a "CALA" code, that resides in the PREMIS database. This code is a Qwest internal code that is not part of the customer's actual address but is somehow based on it. Apparently, in some parts

of the Qwest region, Qwest requires the CLEC to pull the CALA field from the SAV function and return it on an order.

26. When WorldCom built its systems, it did not understand that CALA was required because Qwest's documentation is inconsistent in this regard. Qwest's documentation defines CALA as the "Code used to identify what area an address is located in when a zip code is unavailable." EDI Disclosure Documentation 10.0 "EU-26a/CALA" (emphasis added). WorldCom submits zip codes on its orders, seemingly rendering CALA unnecessary. Moreover, because CALA is an internal Qwest code that can only be obtained through the SAV function and because Qwest does not require use of the SAV function, WorldCom reasonably presumed that CALA was not required. WorldCom acknowledges, however, that part of the Qwest documentation does state that CALA is required if "the ZIP crosses multiple CALAs" – a phrase that has little meaning without an understanding of CALA codes, which is not provided. But WorldCom did not glean from this part of the documentation that CALA codes were required both because this was inconsistent with other parts of the documentation and because CLECs should not have to retrieve and submit an internal Qwest code on their orders. As a result, approximately 10% of WorldCom's orders are rejecting because they do not include the CALA code.

27. The fact is that CALA is a completely unnecessary code that is not required by any other ILEC. And it would require extensive development for WorldCom to reprogram its interfaces to retrieve the CALA code and submit it on orders. Thus, after WorldCom began receiving rejects based on the CALA codes, it expected that Qwest would work

with it to eliminate the rejects caused by the CALA requirement without the need for such reprogramming. But this was not to be.

28. WorldCom requested that Qwest eliminate its requirement that the CLEC provide their internal CALA code. Qwest responded that this was not possible as it is an inherent part of the address validation checks that occur in their front end business process layer edits. WorldCom then asked Qwest to allow CLECs to submit the address without CALA and then to do an internal look up of CALA. Qwest flatly refused to accommodate WorldCom, simply reiterating that CALA is required.

29. WorldCom has now submitted an escalated change request on the CALA issue. WorldCom hopes that Qwest will work with CLECs to resolve this issue on an expedited basis.

30. WorldCom is also concerned that Qwest is not going to be successful in implementing migrate by TN and SANO in April. If Qwest really does need the CALA to process orders at present, Qwest has not explained how it will eliminate this requirement in April.

Seven Digit "Forward To" Numbers

31. Qwest has made little progress on the other problems that I discussed in my initial declaration. Qwest still is unable to process orders for which the existing "forward to" number that WorldCom pulls from the CSR and submits on orders contains only 7 digits (without area code). Qwest claims in its February 14 *ex parte* that its systems work "as designed and documented," but Qwest does not say where in its documentation it says that CLECs must somehow obtain an area code for forward to numbers that have only 7 digits or how that is consistent with its prior claims that pre-order and order interfaces can be fully integrated. Qwest also says that it has agreed to resolve this problem shortly.

Indeed, Qwest has now said that it will resolve the problem on February 28. WorldCom will certainly track the problem to see if it is resolved. But it has not been resolved yet.

Inability to Submit Supplemental Orders Prior to CSR Updates

32. Qwest also has not yet resolved the problem CLECs face in submitting supplemental orders in the days following submission of an initial order. As I noted in my prior declaration, Qwest's ostensible work-around to enable CLECs to do this does not actually work and its proposed alternative was entirely unacceptable. It appears that Qwest may now be working on a different alternative, but at present CLECs are still unable to submit supplemental orders until Qwest has updated a customer's CSR based on the CLEC's initial order.

Requirement to Submit Customer Codes on Orders to Change Features

33. Even after Qwest has updated the customer's CSR, it remains difficult for CLECs to submit orders to change features or other aspects of the customer's account. That is because Qwest requires CLECs to submit customer codes on each order, but often changes these codes.

34. The codes are included on the CSR, but Qwest advised WorldCom that when it submitted supplemental orders or account maintenance orders, it should not use the codes that were on the CSR at the time that WorldCom accessed the CSR in placing the customer's initial order. Instead, WorldCom should use the customer code that Qwest returned on the Firm Order Confirmation ("FOC") or Service Order Completion ("SOC"), which might have changed from the code originally on the CSR. When WorldCom repeatedly asked Qwest during development whether WorldCom should use the code on the FOC or that on the

SOC, Qwest said that it "recommends that WorldCom use the account number contained on the completion notification."

35. When WorldCom entered production, however, it noticed that the customer codes returned on the SOCs were often different than those returned on the FOCs. It provided examples of these discrepancies to Qwest and again asked Qwest what source it should be using for the customer codes. After researching WorldCom's examples, Qwest said that WorldCom should generally use the codes returned on the FOCs, not the SOCs, although this varied depending on the circumstances. Qwest said that it wanted to explain these circumstances to WorldCom using pictures next week in a face-to-face meeting. Thus, it sounds like the answer will be complicated and will almost certainly be different than the answer Qwest provided pre-development. It will be another answer that will require redevelopment on WorldCom's part. And it appears the redevelopment will be complicated as there will not be a clear business rule. Moreover, there is little reason for WorldCom to have confidence that the information Qwest provides next week will turn out to be correct.

DUF Formatting Issues

36. WorldCom has now reviewed a number of Qwest Daily Usage Feeds ("DUF") manually and has begun reviewing them using automated systems as well. It has found several issues with the information Qwest returns on the DUF that are causing DUF records to error out in WorldCom's systems or causing other difficulties.

37. Qwest uses a number of different codes to delineate various "pay per use" calls such as automatic redialing (*66) or call return (*69), rather than a single code to delineate each of these call types. Thus, WorldCom has received codes 033, 061, 063, 067, and 069 on

DUF records accompanied by text indicating the records were for auto-redial calls. But WorldCom does not know whether it should treat all of these codes the same or what it should bill customers for these calls.

38. In addition, in Qwest's central region, Qwest is returning records for pay per use calls such as call return with a code indicating these calls are rated by Qwest. Qwest is transmitting its rate information for the calls, such as the fact that Qwest charges 95 cents for call return. The records should be unrated on the DUF, however, as CLECs set their own rates for these calls. WorldCom's systems are not designed to accept rated DUF records, as Qwest should not be transmitting such records. The records therefore error out in WorldCom's systems.

39. Qwest is also transmitting hundreds of call records without a "bill to" number, which WorldCom expects to receive on every record. These records also error out in WorldCom's systems. WorldCom needs to know whether there is some reason Qwest needs to send some records this way (such as switch limitations) that WorldCom could accommodate, or whether these records are erroneous.

40. Qwest is transmitting apparently incorrect information for those calls that are completed by directory assistance, where the customer accepts an offer for the directory assistance to connect the call (Directory Assistance Completed Calls or DACC). Qwest marks many of these calls as collect calls. But they are almost certainly not collect calls. Calls completed by directory assistance are very unlikely to be collect calls. And some of the information on the DUF shows that they are not. In particular, the numbers billed for the calls are the same numbers from which the calls originated. Because WorldCom does not

expect to receive DACC calls that are collect calls, DUF records delineating DACC calls as collect calls also error out in WorldCom's systems.

41. Qwest has not documented that CLECs should expect to receive the unconventional codes that Qwest in fact transmits. Most likely, many of them are transmitted in error. Qwest must fix such problems, or alternatively, explain to CLECs the codes they can expect to receive. Until then, CLECs will have significant problems reading the DUF and using it to bill customers.

Inaccurate Updating of CSRs

42. In addition to problems with rejects, WorldCom has found that Qwest does not appear to be accurately updating CSRs to reflect WorldCom's orders. WorldCom has found that many of the updated CSRs do not reflect the features and/or blocking options that WorldCom ordered. Indeed, of the 82 completed orders that WorldCom audited, seventeen had blocking options or features that WorldCom did not order. Ten had features to block collect and/or third party calls that were not requested by WorldCom. Six had numbered billing that was not ordered by WorldCom. And one had anonymous call rejection that was not ordered by WorldCom. This is an extremely high error rate for provisioning that will lead to many unhappy customers when calls are blocked or rejected contrary to their requests.

43. It is also interesting to note that there was a significant variance among states. WorldCom looked at CSRs in Washington, Arizona, Colorado, and Minnesota. WorldCom chose these states because three of them are states that have not yet recommended approval of section 271 applications. But WorldCom did not expect any significant variance among states given that Qwest has claimed its OSS is regional. The

variance among states may call into question the accuracy of this conclusion, and require further explanation of the processes used to update CSRs in different states.

44. In addition to the problems it found with updates of features and blocking options, WorldCom has found that Qwest has not properly updated the billing address to reflect that WorldCom should receive the wholesale bill. Of the 82 completed orders, only seven showed WorldCom's address as the billing address. Sixty showed the billing address as that of WorldCom's customers, rather than WorldCom. Fourteen had no billing address. And one had Z-Tel's billing address. This is a major problem. Presumably, Qwest will transmit wholesale bills to the WorldCom customers whose billing addresses are listed on the CSRs, which will almost certainly cause great consternation among WorldCom's customers. (Again, it is interesting to note that there was significant variance between states, with the customer's address primarily appearing as the billing address in Arizona and Colorado and with a blank billing address in Minnesota.)

45. Qwest also has failed to include the line status on many CSRs. Forty eight of eighty two CSRs did not have an updated line status. In addition, Qwest failed to include the service establishment date on the CSRs for many customers. Of the eighty two CSRs, only the seventeen Minnesota CSRs included the service establishment date. Qwest has been unable to tell WorldCom the importance of the line status information or service establishment date or the cause of the discrepancies on the CSRs. But it is clear that discrepancies of this magnitude would not exist in OSS that is ready to ready to effectively support mass market competition.

Conclusion

46. This concludes my declaration on behalf of WorldCom, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

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Sherry Lichtenberg

Executed on: February 27, 2003